

**OCCUPATIONAL SAFETY  
AND HEALTH STANDARDS BOARD**

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**FINAL STATEMENT OF REASONS****CALIFORNIA CODE OF REGULATIONS**

**TITLE 8: Chapter 4, Subchapter 7, Article 107, Section 5155  
of the General Industry Safety Orders**

**Methyl Hydrazine****MODIFICATIONS AND RESPONSE TO COMMENTS RESULTING FROM  
THE 45-DAY PUBLIC COMMENT PERIOD**

There are no modifications to the information contained in the Initial Statement of Reasons.

**Summary and Response to Oral and Written Comments:****I. Written Comments**

Elizabeth Treanor, Director, The Phylmar Group, Inc., by letter dated July 1, 2004.

**Comment:**

Ms. Treanor stated that The Phylmar Regulatory Roundtable (PRR) is a group of companies committed to improving workplace safety and health. PRR whole-heartedly supports the proposal to revise the permissible exposure limit (PEL) for methyl hydrazine and recommends the Board adopt the proposed rule to designate the PEL for methyl hydrazine as a time weighted average rather than a ceiling limit.

**Response:**

The Board thanks Ms. Treanor and The Phylmar Regulatory Roundtable for their support and participation of the proposed standard.

**II. Oral Comments**

Oral comments received at the July 15, 2004, Public Hearing in Sacramento, California.

Dr. Dan Guth, PhD, Toxicologist, representing the Boeing Company.

**Comment:**

Dr. Guth stated that he discovered an error in Title 8 while conducting research and that he brought it to the attention of the Board. Dr. Guth thanked the Board, Board staff, and the Division of Occupational Safety and Health for their work on this proposal and offered his assistance during the Business Meeting should there be any questions.

Response:

The Board thanks Dr. Guth for his participation in the rulemaking process and support of the proposed standard.

ADDITIONAL DOCUMENTS RELIED UPON

None.

ADDITIONAL DOCUMENTS INCORPORATED BY REFERENCE

None.

DETERMINATION OF MANDATE

This regulation does not impose a mandate on local agencies or school districts as indicated in the Initial Statement of Reasons.

ALTERNATIVES CONSIDERED

The Board invited interested persons to present statements or arguments with respect to alternatives to the proposed regulation. No alternative considered by the Board would be more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons than the adopted action.